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**Sampling and Analysis Plan
for Ground Water
Contamination Investigation,
I-70, 44th Street to Brighton
Boulevard, City and County of
Denver, Colorado**

WALSH Project Number: 3026-010
April 19, 1999



Environmental Scientists and Engineers, Inc.

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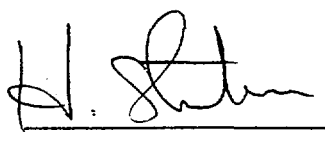
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**SAMPLING AND ANALYSIS PLAN
FOR GROUND WATER CONTAMINATION
INVESTIGATION, I-70, 44TH STREET TO
BRIGHTON BOULEVARD, CITY AND COUNTY OF
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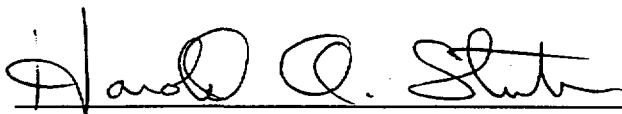
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WALSH Project Number: 3026-010

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SAMPLING AND ANALYSIS PLAN FOR GROUND WATER CONTAMINATION INVESTIGATION, I-70, 44TH STREET TO BRIGHTON BOULEVARD, CITY AND COUNTY OF DENVER

INTRODUCTION

Walsh Environmental Scientists and Engineers, Inc. (WALSH) has been contracted by the Colorado Department of Transportation (CDOT) to conduct a supplemental ground water investigation in the study area. The purpose of the investigation is to identify potential sources of chlorinated solvent contamination discovered during Phase II Site Investigation activities along I-70 from Washington Street to High Street in Denver, Colorado (CDOT Project No. IR-CX)070-4(145)). This study will further delineate ground water contamination detected during earlier studies of the I-70 corridor from Washington Street to Brighton Boulevard (WALSH, 1991a, 1991b, 1992, 1996 and 1998). The investigation is intended to determine whether chlorinated solvent contamination in ground water originates within present or future CDOT right-of-way, or has migrated from unknown up gradient sources.

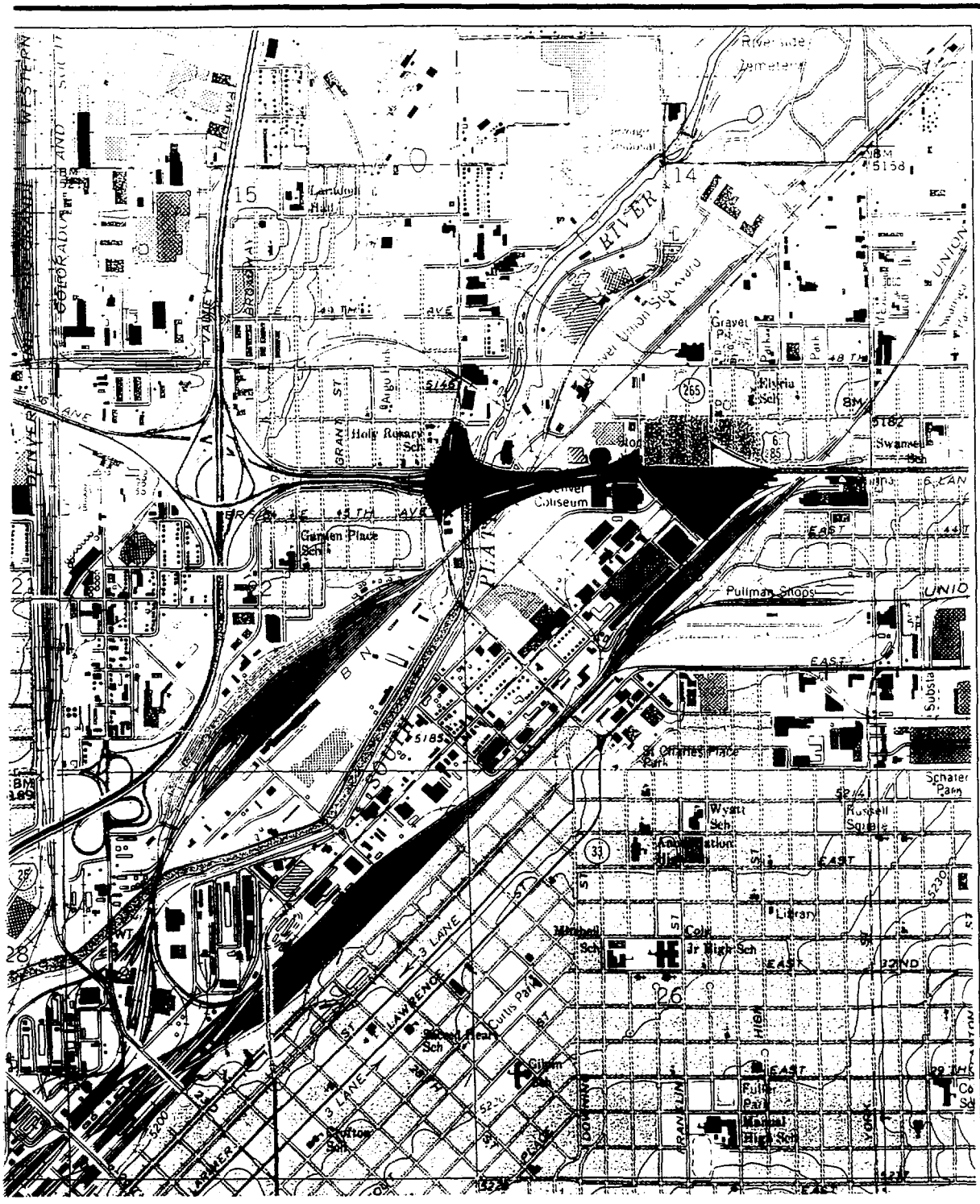
The objectives of this Site Investigation include assessing the current status of ground water pollution and identifying possible onsite or offsite sources of chlorinated solvents (primarily perchloroethene). Goals include identifying the need for remedial action and potential environmental liability associated with future right-of-way acquisition. Special handling and disposal may also be required for excavated soil, or where construction activities encounter contaminated ground water. Construction worker and public health and safety issues identified during this investigation will be discussed under a Materials Management Plan (MMP) issued when analytical results of this investigation are available.

PROPOSED CONSTRUCTION AND PROPERTY ACQUISITION

CDOT is replacing the elevated portion of I-70 from Washington Street to Brighton Boulevard with a wider, elevated highway (see Figure 2). Existing ramps at Humboldt Street will be removed and replaced with interchanges constructed at Washington Street and Brighton Boulevard. The existing elevated structure east of Humboldt Street will be replaced, and fill material will be used to support I-70 east of Humboldt Street.

Design plans indicate that property acquisition is required for the widening of I-70, the widening of Washington Street, and the relocations of 46th Avenue and Brighton Boulevard. The Union Pacific Railroad (UPRR) tracks (south of I-70 at Brighton Boulevard) will be moved southward to accommodate proposed ramp structures. Construction of retaining walls, culverts, storm/sanitary sewers, and other utility relocations will require excavation at various locations in the project area.

Figure 1 VICINITY MAP



Approximate Map Scale: 1:15,000

R 68 W

Map Source: USGS Commerce Quadrangle
Colorado, 7.5 Min. Series (topographic) 1959
Revised 1980

Site

Walsh

Environmental Scientists and Engineers, Inc.

Site Vicinity Topographical Map

Job 3026-010

Date 4/99

Figure 1

REGIONAL SETTING

Location

The area investigated is located within the City and County of Denver, Colorado and is shown in Figure 1. The initial phase of the construction will involve the widening of the eastbound lanes of I-70 from Washington Street to Humboldt Street. Properties affected by the Phase I and Phase II construction activities were evaluated in WALSH, 1997 and 1998. Properties included in this investigation are located between 44th Street and Brighton Boulevard, south of I-70. Properties to be sampled have been or will be acquired by CDOT. Construction activities extend ramps away from I-70 and into existing neighborhoods and commercial areas approximately bounded by 44th Street and Brighton Boulevard on the south and 47th Avenue on the north. The UPRR tracks will be relocated south of their present position.

Physiography and Geology

The project area is located in the Denver Basin, east of the Front Range Uplift of the Southern Rocky Mountains. Topographically the area is generally flat with elevations decreasing towards the South Platte River (Figure 1). Surface drainage is towards the South Platte River. The project area is covered by a thin veneer of unconsolidated sediments which include the Recent Alluvium (Quaternary) and the Post Piney Creek Alluvium (Holocene). These sediments are generally poorly sorted sands, gravels and some clays. Flat lying bedrock of the Cretaceous/Tertiary Denver Formation, consisting of weathered shale, siltstone, and fine sandstone, is unconformably overlain by the younger unconsolidated sediments. Depth to the basement bedrock surface near I-70 and east of Humboldt Street is approximately 45 feet (Aguirre, 1995).

The top of the Denver Formation marks the base of the unconfined aquifer. Depth to groundwater is expected to be approximately 27 to 34 feet below ground surface in the vicinity of Humboldt Street and Brighton Boulevard (WALSH, 1991b, 1992 and Aguirre, 1995). Local unconfined groundwater flow, east of the South Platte River is to the northwest (WALSH, 1991b). Groundwater flow velocities were estimated to vary between 20 and 200 feet per day within the study area (WALSH, 1996). More details of the local geology and groundwater conditions are found in the various WALSH reports (1991b, 1992, 1996, 1997, and 1998) and the geotechnical report by Aguirre (1995).

REVIEW OF EARLIER ENVIRONMENTAL INVESTIGATIONS

Phase II and III of the modifications to I-70 between Humboldt Street and Brighton Boulevard traverse a commercial, industrial and residential area where many environmental concerns have been identified. Several properties of concern were identified between 44th Street and

Brighton Boulevard in 1991 and 1992 (WALSH, 1991a, 1991b, and 1992), including nine properties with known or suspected USTs. This study was expanded in July 1991 to include I-70 corridor from Washington Street to Brighton Boulevard and was revised in late 1996. These reports identified four main categories of environmental concern: petroleum contaminated soils and ground water from leaking USTs and ASTs; possible soil and ground water contamination from tannery operations; and soil contaminated with smelter wastes resulting in elevated heavy metal content. Chlorinated solvents (PCE) were discovered in several monitoring wells and sampling performed during March of 1999 has confirmed the presence of PCE at concentrations above safe drinking water levels. However no source has been positively identified for these contaminants. Abandoned USTs of unknown use were removed from three locations during late 1998 and early 1999 (WALSH, 1999). Laboratory analyses performed during the tank removals did not detect chlorinated solvents in either the tank contents or surrounding soils. Analyses detected only diesel range hydrocarbons which indicated that the tanks had probably stored fuel oil.

This investigation is intended to determine if chlorinated solvents in ground water originate within the present or future CDOT right-of-way, or migrate onto CDOT ROW from unknown upgradient sources. The potential human health and environmental risk will also be evaluated to determine the need for remedial action.

ENVIRONMENTAL CONCERNS AND PROPOSED AREAS OF INVESTIGATION

The location of the proposed monitoring wells are shown on Figure 2.

The environmental concerns for this investigation are limited to defining contaminant source locations of PCE in ground water and refining the known extent of contamination.

SAMPLING AND ANALYSIS RATIONALE

Walsh proposes to drill three additional test holes/monitor wells in the southeast (upgradient) of the project. Upgradient locations (TH-26, TH-27, and TH-28) should identify possible site migration onto the property from the southeast. TH-26 will be located near the ROW boundary upgradient of TH-19 and is intended to determine if PCE concentrations in TH-19 originated on the property or migrated from industrial properties to the southeast. TH-27 and TH-28 will be located upgradient of TH-24 which contains the highest concentrations of PCE detected in any test hole. One well (TH-13) in close proximity to TH-24 will be re-sampled to further assess a possible source within the project area. BW-13, which is near the upgradient project boundary, will be resampled to help determine the downgradient extent of contamination and possible impact to offsite receptors.

Ground water will be tested for VOCs and TEPH. Soil samples will be tested for VOCs, EX/MTBE, and TEPH.

er levels will be surveyed in the wells to refine potentiometric surface maps and help mine flow directions and pathways.

SAMPLING METHODOLOGIES

Soil Sampling

location of the proposed test holes are shown on Figure 2. Monitor wells will be drilled to both not to exceed 40 feet. Test holes will be drilled using 8-inch hollow stem continuous augers. Test holes will be monitored during drilling for both combustible gases and leaks using a calibrated combustible gas indicator (CGI) and a calibrated photoionization detector (PID). Sample headspace measurements will be taken using the PID to field screen VOCs.

samples from all test holes will be collected at a maximum interval of 5 feet beginning at surface using a stainless-steel split spoon sampler. Discrete soil samples will be sent to the laboratory, depending on field observations. If field screening instruments do not indicate aminants and visual/olfactory indications of contamination are absent, a soil sample will be cted above the ground water/capillary zone for laboratory analyses. At least one sample borehole will be collected. All samples will be collected in glass jars with Teflon-lined

Samples will be kept on ice at 4 degrees Celsius (4° C) in coolers for delivery to the laboratory. Chain-of-custody records will be completed for each sample. Complete logs will be prepared for all test holes. Sample preservation is outlined in Table 2.

Ground Water Sampling

and water will be sampled through factory-slotted (screened) PVC pipe inserted in the test s. Screened PVC sections will be installed from total depth to at least 2 feet above the water table. Solid 2-inch PVC sections with a locking cap will be used to extend the ned interval to the surface. Silica sand will be poured around the PVC to approximately 2 above the screen and bentonite chips added from the sand to approximately 1.5 feet below surface to seal the annular space. Concrete will be used to secure a flush mount or steel up protective cover. Monitor wells will be developed by purging a minimum of 10 casing nes of water. Prior to sample collection, the well head space will be measured for VOCs g a PID and the standing water will be field tested during bailing for pH, conductivity and erature. The stability of these measurements and the total volume of water purged will e that the ground water sample is representative of the formation. Ground water sampling s will be completed for each test hole.

Ground water samples will be retrieved with a disposable polypropylene bailer and be collected for analysis as follows: two 40-milliliter (ml) VOA vials for VOCs and BTEX; and one 1-liter (L) glass bottles for TEPH. All samples will be placed immediately in an ice-filled cooler to maintain a temperature of 4° C and delivered to the laboratory with complete chain-of-custody records. Table 1 outlines the containers and preservation techniques required for the samples.

Surveying

The potentiometric surface of this area is known from previous studies. The ground level and existing elevations of newly installed piezometers will be recorded by global positioning system (GPS) using the dual frequency method, as specified in the contract with CDOT. The GPS system will also record the location and ground elevations of the test holes and shallow soil sample sites.

LABORATORY ANALYSES

Samples may be analyzed for BTEX/MTBE, Total Extractable Petroleum Hydrocarbons (TEPH, diesel range hydrocarbons), and Volatile Organic Compounds (VOAs, EPA Method 810). Table 1 presents the analyses, containers required, and preservation method for each sample type.

Table 2 outlines the analyses that are anticipated for the soil samples, the containers required, and the preservation techniques.

CHAIN-OF-CUSTODY

A Chain-of-Custody record for each sample will track the possession and transfer of samples from time of field collection through laboratory analysis. The record will contain the following information:

- Sample tag number;
- Signature of collector;
- Date and time of collection;
- Sample type (soil or ground water);
- Identification of test hole or monitoring well;
- Requested laboratory analyses;
- Signatures of individuals in custody of the samples;
- Dates and times of possession.

Table 1 Water Sample Methods, Containers and Preservatives		
Analysis and Method	Container	Preservative
TEPH, EPA 8015	1-1L glass or nalgene	HCl, pH < 2, Cool
TVPH, EPA 8015	2-40 ml VOA vials	HCl, pH < 2, Cool
BTEX, EPA 8020	2-40 ml VOA vials	HCl, pH < 2, Cool
VOAs, EPA 8260	2-40 ml VOA vials	HCl, pH < 2, Cool
SVOAs, EPA 8270	1-1L amber glass	Cool
Total RCRA Metals, EPA 7000 et Seq., 6020 or ICP	1-1L HDPE	Field filtered, HNO ₃ , pH < 2, Cool
Total Cyanide, EPA 335.2	1- 1L HDPE or glass	Add NaOH until pH > 12, refrigerate in dark
pH, probe Alkalinity, EPA 310.1 TSS, EPA 160.2 TDS, EPA 160.1	1-1L HDPE	Cool
COD, EPA 410.1	1-250 ml HDPE	H ₂ SO ₄ , pH < 2, Cool
Oil and Grease, EPA 413.1	2-1L amber glass	H ₂ SO ₄ , pH < 2, Cool
Gross Alpha and Beta Radioactivity, SW 9310	1-1L HDPE	HNO ₃ , pH < 2, Cool
TEPH - Total Extractable Petroleum Hydrocarbons BTEX - Benzene, Toluene, Ethylbenzene, Xylenes COD - Chemical Oxygen Demand TDS - Total Dissolved Solids SVOAs - Semi-volatile Organic Compounds		TVPH - Total Volatile Petroleum Hydrocarbons RCRA - Resource Conservation and Recovery Act TSS - Total Suspended Solids VOAs - Volatile Organic Compounds

Table 2 Soil Sample Methods, Containers and Preservatives		
Analysis and Method	Container	Preservative
TEPH, EPA 8015	1-4 or 8 oz glass	Cool
TVPH, EPA 8015	1-4 oz glass	Zero headspace, Cool
BTEX, EPA 8020	1-4 oz glass	Zero headspace, Cool
VOAs, EPA 8260	1-4 oz glass	Zero headspace, Cool
SVOAs, EPA 8270	1-4 oz glass	Cool
RCRA 8 Metals, EPA 7000 et. Seq., 6020 or ICP	1-8 oz. glass	None (Cool)
TCLP Non-volatiles	1-8 oz glass	Cool
Total Cyanide, SW 9010	1-8 oz glass	Cool
TEPH - Total Extractable Petroleum Hydrocarbons RCRA - Resource Conservation and Recovery Act SVOAs - Semi-volatile Organic Compounds TVPH - Total Volatile Petroleum Hydrocarbons		TCLP - Toxicity Characteristic Leaching Procedure BTEX - Benzene, Toluene, Ethylbenzene, Xylenes VOAs - Volatile Organic Compounds

QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) PROCEDURES

Purpose

Quality assurance for field measurements and laboratory analyses ensure data quality will withstand the scrutiny of litigation.

Data Quality Objectives

Data quality objectives include quantitation of the primary contaminant of concern to concentrations at or below applicable regulatory requirements. The most stringent applicable requirement for ground water is usually the maximum contaminant concentration (MCL) under the Safe Drinking Water Act (SDWA). Laboratory analytical methods proposed in this SAP will meet the SDWA standard. The field and laboratory methods used in this project respond to Levels I and III (EPA, 1987), and are described below.

Level I - Field screening or analysis using portable instruments. Results are often not compound specific and not quantitative, but results are available in real-time.

Level III - All analyses performed in an off-site laboratory. Level III analyses may or may not use Contract Laboratory Program (CLP) procedures, but do utilize the validation or documentation procedures required of CLP Level IV analyses. According to EPA, Level III data is suitable for potential responsible party determinations.

Decontamination

All sampling equipment will be decontaminated following each split spoon sample. Handlers will be decontaminated between each sample location. Decontamination of water sampling equipment will be done between test holes. All sampling equipment will be washed with deionized water containing Alconox™ followed by a deionized water rinse. Drill augers will be steam cleaned between drilling of test holes.

All personnel will wear rubber gloves at all times while handling samples. New gloves will be donned at frequent intervals and following collection of grossly contaminated samples to reduce the potential of cross-contamination.

9.4 Field Documentation

All field notes will be maintained in a bound field notebook or be recorded on appropriate field sampling forms. Notebook entries will be made in black ink; each page will be sequentially numbered, initialed, and dated. Field data will be included in the appendix of the final report with measurements in standard units.

9.5 Sample Preservation

Field sample preservation procedures are outlined above in Laboratory Analyses (Section 7.0). Samples will be maintained at a temperature of 4° C and promptly delivered to allow analysis within the prescribed holding times.

9.6 Field Instrument Calibration

All field instruments will be calibrated daily. The pH and conductivity meter will be calibrated using commercially prepared pH and conductivity solutions. The PID and CGI will be adjusted to read the concentration (PID) or percentage (CGI) of bottled gas standards as described in the operating manuals. Calibration procedures will be documented in the field notebook.

9.7 Field and laboratory Quality Assurance/Quality Control (QA/QC)

QA/QC samples will include field blanks and blind duplicate samples obtained during sampling. Industry approved laboratories (WALSH, Analytica, or Environmental Chemistry Services) will perform the laboratory analysis of water and soil samples. The laboratory provides QA/QC data from spikes, blanks, trip blanks, replicates, and duplicates. All samples transmitted to the laboratories are handled according to strict chain-of-custody protocol. Laboratory analysis will be completed within prescribed holding times.

9.8 Final Report

To assure report quality, senior scientists will prepare draft and final reports. The final reviewer will be a principle of the firm who has not been involved in the site evaluation. The report will present the results of laboratory analysis of soil samples and ground water samples, geophysical conclusions and data, field observations, conclusions, and recommendations.

9.9 Control of Waste Materials

Contaminated soils and waters will be placed in DOT-approved containers. Drums will be transported to a site designated by the CDOT.

9.10 Health and Safety Plan (HASP)

A HASP has been developed for all field activities to be conducted during this investigation. Field personnel will be required to review, sign, and comply with all HASP provisions.

10 REFERENCES

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